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October 28, 2024

Sweigert v. Goodman, 23-cv-05875-JGK
Associated action: 23-cv-06881-JGK

U.S. Magistrate Judge Honorable Valerie Figueredo
U.S. District Court for the Southern District of New York
500 Pearl Street
New York, N.Y. 10007
Via ECF filing

SUBJ: REQUEST for extension of deadline to file Motion to Amend

Dear Judge Figueredo,

1. The undersigned writes to you to seek an extension of the due date for the Motion to Amend. This is the plaintiff's second request for extension and a copy of this request has been sent via e-mail message to the defendant. This is the plaintiff's second request for an extension as contrasted to the four requests of the defendant.
2. Pursuant to your Individual Rules of Practice the *pro se* plaintiff seeks an extension of time to file a Motion to Amend with the accompanying Second Amended Complaint pursuant to the Order of the presiding judge¹. This Order was signed 10/11/2024 but was not docketed until 10/15/2024. The Court was closed due to a federal holiday on 10/14/2024. The Order was mailed 10/16/2024 (ECF docket). "Normally it is assumed that a mailed document is received three days after its mailing. Sherlock v. Montefiore Med. Ctr., 84 F.3d 522, 525 (2d Cir. 1996). Thus, the *pro se* plaintiff did not have constructive notice of this Order until 10/19/2024 (Saturday).
3. It was unforeseen that Hurricane Helene and Milton would strike the county where my ex-wife and handicapped son are domiciled. Hurricane Milton required the relocation of my handicapped son from his group home to several shelters not equipped for special needs adults.

¹ Doc. 169, 10/11/2024, 23-CV-05875

4. This situation consumed the undersigned's attention for a week as arrangements had to be made to shelter the plaintiff's son at various locations as his primary home was damaged by the weather, requiring the plaintiff's authorization and consultation. This was a very nerve-wracking experience that preoccupied the plaintiff's time so as not to religiously check the Court docket.

5. To add insult to injury the defendant has released another video on Saturday, 10/26/2024, (EXHIBITS) which must be addressed in the proposed Second Amended Complaint and the Exhibits Annex. This video provides solid evidence of the actionable defamatory statements made by the defendant. Unfortunately, inserting this latest evidence into these documents will require careful reconstruction as the Exhibits Annex is interlocked with the proposed Second Amended Complaint and will require significant edits to both.

6. In light of the foregoing, the plaintiff herein requests an extension of the deadline in this action to be effective Monday, November 4, 2024. Respectfully, Signed 10/28/2024



D.G. SWEIGERT, PRO SE PLAINTIFF

CERTIFICATE OF SERVICE

Hereby certified under penalties of perjury that a true copy of this pleading has been e-mailed to YouTuber Jason Goodman at jason@21stcentury3d.com and <truth@crowdsourcethetruth.org>
Respectfully, Signed this October 28, 2024 (10/28/2024).



D.G. SWEIGERT, PRO SE PLAINTIFF

EXHIBITS

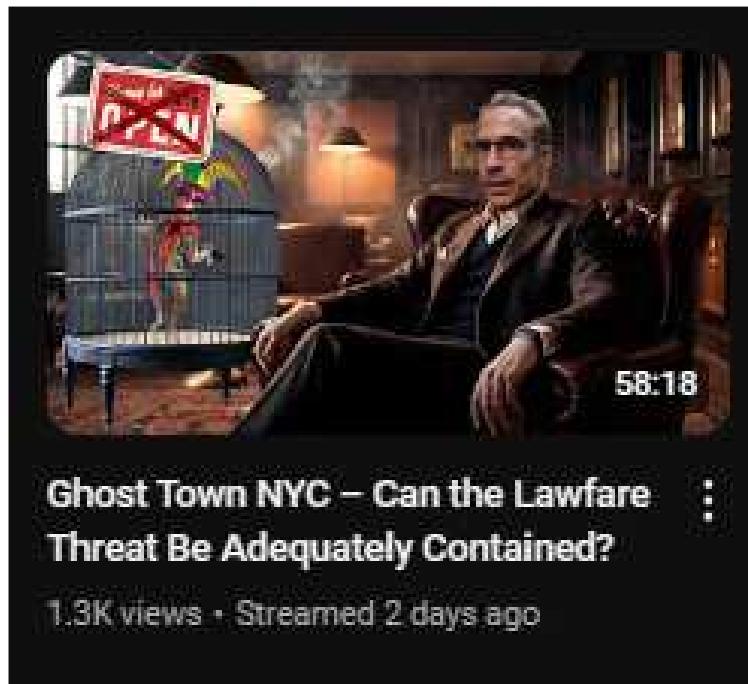
>> On 11/20/2023 5:08 PM PST Jason Goodman <jason@21stcentury3d.com> wrote:

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>> How do you get away with committing mail fraud and forging documents in court if you aren't working for the federal government? Who do you think you are? You are pathetic occupying your worthless life in your quest to fuck up mine. What kind of noble mission do you believe you are on destroying the constitution and the country? Only a nazi or a psychopath would want to do that. That's why I'm convinced your schizophrenic father who so enjoyed punching you the face was part of operation paperclip. No Sweigert was ever any hero of any kind. Each of you are despicable, vile traitors who deserve to be in prison or better yet at the gallows.

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<https://www.youtube.com/watch?v=LL9AE03Dxio>

